

UST SECTION
June 10, 2004

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Allen Porter, President
Tanknology
7762 East Gray Rd., Suite 200
Scottsdale AZ 85260

RE: Withdrawal of State's Approval for use of 3-Phase Assessment as an Alternative Integrity Assessment Method for Underground Storage Tanks

Dear Mr. Porter:

This is to notify you that the North Carolina Department of Environment and Natural Resources (NCDENR), UST Section has withdrawn its approval of 3-Phase Assessment for use as an alternative method for assessing the structural integrity of unlined steel tanks prior to upgrading with corrosion protection. In June 1994, pursuant to federal regulation 40 CFR 280.21(b)(2)(iv) as incorporated by state rule 15A NCAC 2N .0302, NCDENR granted its approval of 3-Phase Assessment as a method of determining if unlined steel USTs were suitable for upgrading with corrosion protection. Because the December 22, 1998 upgrade deadline has long since passed diminishing the need for integrity assessments of unlined steel tanks, the method is no longer valid in the state of North Carolina for this purpose.

Should you have any questions, please do not hesitate to call me at (919) 733-8486.

Sincerely,



Ruth A. Strauss, Head
Permits and Inspection Branch

cc: Grover Nicholson